

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

LESTER LEE,

PLAINTIFF

v.

**BROOKSIDE PARK CONDOMINIUM,
INC., METROPOLIS (aka MCM, INC.),
RAMMY AZOULAY AND LAMONT
SAVOY**

DEFENDANTS

Case No. 8:24-cv-01205-TJS

**DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka
MCM, INC.), AND RAMMY AZOULAY’S MOTION TO COMPEL ANSWERS TO
DISCOVERY**

Defendants **BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), AND RAMMY AZOULAY** (hereinafter “BPC Defendants” or “Defendant”), by and through undersigned counsel, hereby respectfully moves this Court pursuant to Local Rule 104.8 to compel Plaintiff to answer discovery. As grounds for the Motion, Defendants state as follows:

1. Interrogatories and Document Requests were sent to the Plaintiff on August 14, 2024.

2. No responses have been forthcoming.

3. An email was sent on February 11th regarding late answers to interrogatories.

Pursuant to Local Rule 104.8, the parties had a conversation on February 12th, 2025. Defendant had served the draft Motion to Compel and discovery on Plaintiff.

4. Plaintiff's counsel promised answers to discovery by Wednesday February 19, 2025. Plaintiff failed to file the answers yesterday.

5. Per the Court's Scheduling Order, discovery closes February 18, 2025 and Defendant has been prejudiced without the Answers to Interrogatories and document requests.

6. Accordingly, Defendants request that Plaintiff be compelled to answer Interrogatories and Document Requests.

MEMORANDUM OF GROUNDS AND AUTHORITIES

Local Rule 104.8

Respectfully submitted,

/s/Anthony D. Dwyer

Anthony D. Dwyer (415575)
ECCLESTON & WOLF, P.C.
Baltimore-Washington Law Center
7240 Parkway Drive, 4th Floor
Hanover, MD 21076-1378
(410) 752-7474 (phone)
(410) 752-0611 (fax)
E-mail: dwyer@ewva.com
*Attorney for Defendants Brookside Park
Condominium, Inc., Metropolis (aka MCM,
Inc.), and Rammy Azoulay*

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 20th day of February, 2025, copies of the foregoing **DEFENDANTS BROOKSIDE PARK CONDOMINIUM, INC., METROPOLIS (aka MCM, INC.), AND RAMMY AZOULAY'S MOTION TO COMPEL DISCOVERY ANSWERS** were served by first-class mail, postage prepaid to:

Richard Bruce Rosenthal, Esq.
545 E. Jericho Turnpike
Huntington Station, NY 11746
631.629.8111 (Phone
richard@thedoglawyer.com
Pro Hac Vice

/s/Anthony D. Dwyer
Anthony D. Dwyer (415575)